

THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

CARLOS OMAR RIVERA GONZALEZ

DEBTOR

CASE NO. 12-07512-ESL

CHAPTER 13

**DEBTOR'S MOTION FOR EXTENSION OF TIME TO
REPLY TO TRUSTEE'S MOTION TO DISMISS, DOCKET #72**

TO THE HONORABLE COURT:

NOW COMES, CARLOS OMAR RIVERA GONZALEZ, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. The Chapter 13 Trustee filed a *Trustee's Motion to Dismiss*, docket #72, stating that the debtor has failed to maintain current the proposed Plan payments in the sum of \$450.00.

2. The debtor contacted the undersigned attorney via telephone regarding this matter and respectfully submits that he did incur in Plan arrears due to certain economic problems.

3. The debtor respectfully submits to this Honorable Court that he needs thirty (30) days to favorably resolve this situation and reply the Trustee's motion to dismiss, which extension time to expire on February 8, 2015.

WHEREFORE, debtor, through their undersigned attorney respectfully requests that for the above stated reasons this Honorable Court grant the requested extension of time.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of same to: the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to the debtor, Carlos

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Debtors' Motion for Ext of Time To Reply to MTD
Case no. 12-07512-ESL13

Omar Rivera Gonzalez, to the address of record: 107 Paseo Torre Alta Barranquitas, PR
00794.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, this 9th day of January,
2015.

/s/ Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
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